

MCTV Network/City of Midland, MI

August 5, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

The MCTV Network submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

The MCTV Network is a service of the City of Midland, Michigan operating four cable access channels (two public, one educational, one government). Our programming is available to 20,000 subscribers in the Midland area on Charter Communications cable.

We carry several hundred programs on our channels each year. Several programs that are produced on a national or state level including “Veterans Update” and “Soldiers Journal”: are closed captioned The onscreen video programming guide of our multichannel video programming distributor (MVPD), Charter Communications, does not provide a label or symbol indicating that this program these programs have closed captions.

Our community is also served by AT&T’s U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator’s system, which the visually impaired can reach simply by remembering the right channel number, 96-99 and 991-994, with AT&T’s PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to “see” and navigate. In our area, AT&T has two different local jurisdictions, and a total of five different PEG channels, on its “channel 99” PEG application. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually navigate a menu of two different local community jurisdictions and find and press the correct one, and then after that, visually navigate a sub-menu of 5 different PEG channels, and find and press the correct one, to reach our PEG channel. Moreover, AT&T PEG product’s lack of a truly effective “last channel” function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another.

In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, our PEG channels on AT&T's U-verse system.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

A handwritten signature in black ink, appearing to read "Ron Beauman". The signature is fluid and cursive, with the first name "Ron" being more prominent than the last name "Beauman".

Manager of MCTV & Library Communications

Grace A. Dow Memorial Library

Midland, MI

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